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Hon. Leonard B. Sokolove

January 22, 2018

VIA ECF

The Honorable Roberto A. Rivera-Soto
Ballard Spahr, LLP
210 Lake Drive East
Suite 2900
Cherry Hill, NJ 08042

Re: Williams v. BASF Catalysts, LLC, et al.
U.S.D.C. N.J.; No. 2:11-cv-01754

Dear Judge Rivera-Soto:

I am taking this opportunity to report on the status of the files “held” by the Rothenberg Firm with respect to the above-captioned matter.

As ordered by Your Honor, counsel for both parties to this litigation submitted their names for representatives of the Rothenberg firm to then attempt to obtain the files in this matter. To reiterate, the files were not under the direct physical control of the Rothenberg Law Firm but, at their direction, the requisite number of files satisfying the Court Order were pulled and transferred to Mr. Placitella. His firm subsequently undertook its responsibilities under your Court Order. It is now my understanding that under this narrow proscription of responsibilities, the Rothenberg firm has now complied with the spirit and letter of your Order.

However, let me address one other issue. There was discussion about the potential existence of a so-called “Master File” which the parties hoped to find and obtain. A complete review of the files indicates the existence of no such file. Indeed, we went so far as to hire an investigator in an attempt to find a previous employee of the Firm who assisted the Firm and Mr. Schwartz in the handling of these files, and the closing and ultimate boxing for storage of the same, approximately 28 years ago.



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I was able to reach her by telephone. While her memory was somewhat foggy given the passage of years, she stated to me with a great deal of certainty that she knew of no such "Master File" that she either produced, handled or boxed with respect to this matter. I have no reason to doubt her word on this issue and it appears to comport with the failure to locate such a file in the storage facility.

I believe that at this juncture, this should resolve those responsibilities immediately before the Rothenberg Law Firm in this matter. I am, of course, prepared to address any further issues the Court may have at this time.

One further aside. I was at the Atlanta and Minnesota games as I am sure you were too. I can tell you that I am still not hearing very well but perhaps things were a bit quieter in Section 102!

Respectfully submitted,

ROBERT D. SOKOLOVE, *Pro Hac Vice*
rds/r